

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

BRIAN WILLIAMS,
PLAINTIFF.

V.

SGT. GIBBS,
DAVE (LAST NAME N/A),
ALTON CITY JAIL, et al.,
DEFENDANTS,

CASE NO.

10-444-JPH

CIVIL COMPLAINT
JURY DAMAND

FILED

JUN - 2 2010

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

I. JURISDICTION = 28 § 1331, 28 § 1442, 1443

A. BRIAN WILLIAMS, 1700 EAST BROADWAY
ALTON, IL. 62002

B. DEFENDANTS: SGT. GIBBS, DAVE (STAFF MEMBER),
ALTON CITY JAIL, et al.

STATEMENT OF FACT

PLAINTIFF IS A FEDERAL INMATE HOUSED IN ALTON CITY JAIL, 1700 EAST BROADWAY ALTON IL. 62002.

ON 5/29/10 ON ARE ABOUT 200PM DEFENDANT, DAVE (STAFF) AT ALTON CITY JAIL, VIOLATED PROCEDURAL PROTOCOL WHEN DEALING WITH INMATES, THUS BRINGING FORTH CRUEL AND UNUSUAL PUNISHMENT AGAINST THE PLAINTIFF.

IN THAT, ON 5/29/10 PLAINTIFF WAS ESCORTED WITH ANOTHER INMATE (COREY HINES) FROM THE VISITATION, AND DURING THIS PERIOD PLAINTIFF WAS BRUTALLY CHOKED AND SUFFERED A HEAD INJURY, BY THE INMATE.

"ALTON CITY JAIL IS A 23 HOUR LOCK DOWN FACILITY. AND IT IS REQUIRED THAT EVERY INMATE IS TO HANDCUFFED COMING TO AND FROM THERE CELLS AT ALL TIMES."

(1)

IT IS REQUIRED THAT EACH INMATE BE ESCORTED TO THERE CELLS BY STAFF FOR SAFETY REASONS. DURING THE TIME PLAINTIFF WAS ESCORTED TO HIS CELL BLOCK WITH OTHER INMATE, COREY HINES, PLAINTIFF HANDCUFFS WERE TAKEN OFF ALONG WITH THE OTHER INMATES AND STAFF (DAVE) MADE US GO INTO THE CELLBLOCK, WITHOUT OPENING OUR CELL DOORS, AND WALKED AWAY. THIS IS NOT NORMAL PROTOCOL WHEN DEALING WITH INMATES, AT ALTON CITY JAIL. WHEN DAVE (STAFF MEMBER) WALKED AWAY PLAINTIFF WAS ASSAULTED BY INMATE (COREY HINES). PLAINTIFF WAS TAKEN TO THE EMERGENCY ROOM THE NEXT DAY 5/30/10 BY POLICE ESCORT HERE AT ALTON CITY JAIL FOR NECK AND HEAD INJURIES.

INMATES ARE TO REMAIN HANDCUFFED UNTIL THEY ARE IN THEIR CELLS AT ALL TIMES. THEREFORE, BECAUSE DAVE (STAFF MEMBER) VIOLATED THIS PROCEDURAL PROTOCOL, CRUAL AND UNUSUAL PUNISHMENT WAS INFLICTED ON PLAINTIFF, AND STAFF HERE AT ALTON CITY JAIL IS LIABLE FOR THIS VIOLATION OF PLAINTIFFS RIGHTS. DAVE HAS ADMITTED TO PLAINTIFF HE WAS LIABLE FOR THE ASSAULT AND INSISTED THAT I NOT SEEK FURTHER ACTION.

PLAINTIFF IS NOW SUEING DEFENDANTS FOR ALLOWING INMATE (COREY HINES) TO CONTINUE TO CHOCK PLAINTIFF ALMOST 3 MINUTES WITHOUT ANY ASSISTANCE FROM STAFF, AND ALSO FOR HEAD INJURIES. ALL IN VIOLATION OF PLAINTIFFS RIGHTS.

WHEREFORE, PLAINTIFF SUEING DEFENDANTS AND THEIR OFFICIALS AND INDIVIDUAL CAPACITY FOR "CRUAL AND UNUSUAL PUNISHMENT."

DATE 5-31-10

BRIAN WILLIAMS
1700 EAST BROADWAY
ALTON, IL. 62002

s/ Brian Williams

I SWEAR UNDER THE ACT OF PURJURY

THE NOTARY PUBLIC WILL NOT NOTARIZE THIS DOCUMENT.

s/ Brian Williams

WITNESS

James C. Nelson
JAMES C. NELSON